



February 2, 2023

Mr. Don Brown
Clerk of the Board
Illinois Pollution Control Board
100 West Randolph Street, Suite 11-500
Chicago, IL 60601

Re: Comments for Case #R2023-018- 35, IL Adm Code Parts 201, 202, and 212

Dear Mr. Brown:

On behalf of the Glass Packaging Institute (GPI), the North American trade association for the glass food and beverage manufacturing companies, glass recycling and suppliers to the industry, I am providing the following comments and perspective on changes to Startup, Shutdown, and Malfunction (SSM) housed within the IL Environmental Protection Act, as proposed by the Illinois EPA.

Illinois Glass Container Manufacturing

The glass container manufacturing industry operates two plants in Illinois (**O-I Glass, Streator**) and **Ardagh Glass (Dolton)**. Collectively, these plants employ several hundred residents in high-paying, benefits-provided careers, manufacturing millions of glass bottles and jars in support of nearby food and beverage markets every day.

Similar to glass container manufacturing across the country, Illinois' glass container plants rely on infrequently used, but absolutely critical, start-up, shut-down, maintenance (SSM) provisions included within their EPA Title V permits and local permitting operational agreements. When SSM events do occur, they are unplanned, quickly addressed and reported in accordance with permitting requirements and obligations.

It is important to highlight that glass container plants run continuously, 24 hours a day, 365 days per year. Even in slower production periods when furnace maintenance is being performed, they are never completely shut down unless their furnace (the key component of the glass plant) is being rebuilt or replaced. This is because raw materials inputs, alongside recycled glass, are continuously melted to form new bottles and jars.

Completely shutting down furnace operations due to an instance of SSM would result in a catastrophic scenario, with raw materials in the furnace becoming solidified, posing a clear threat to future plant operations and the jobs they support. Furnace rebuilds are planned out years in advance, due to significant capital expenditure requirements.

Removal of a practical SSM operating provision, as currently proposed by the Illinois EPA, would result in the scenario described above. As such, we respectfully request that the Board not advance the proposed SSM amendments, currently under consideration.

GPI and its member companies look forward to opportunities to engage with the Illinois Control Board, the Illinois EPA and all stakeholders on proposed revisions to SSM regulations.

Sincerely,

A handwritten signature in black ink that reads "Scott DeFife". The signature is written in a cursive, slightly slanted style.

Scott DeFife
President